

1 IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF TEXAS

2 DALLAS DIVISION

3 Civil Action No. 3-06cv2322-N

4 BLANCA VALENZUELA, MARGIE SALAZAR, JOSE A. SERRATO,

JOSIE RENDON, CLARA TOVAR, CONSUELO ESPINO, MARIA

5 AVILA, ERNESTINA NAVARRETTE, MARIA E. MUNOZ, AMANDA

SALCIDO, CANDELARIO G. ORTEGA, MARIA ORTIZ, JOSE

6 OLIVA, RAFAELA CHAVEZ, ELODIA ARROYO, SUSANA CARDIEL,

GRACIE RIOS and LEONEL RUIZ, individually and on

7 behalf of all others similarly situated,

8 Plaintiffs,

9 v.

10 SWIFT BEEF COMPANY, INC., d/b/a SWIFT COMPANY, SWIFT &

COMPANY, HICKS, MUSE, TATE & FURST, INC., HM CAPITAL

11 PARTNERS OF DALLAS, LLC, and JOHN DOES I-V,

12 Defendants.

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13 DEPOSITION OF: JAMES A.R. HAMILTON - April 9, 2008

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15 PURSUANT TO NOTICE, the deposition of

JAMES A.R. HAMILTON was taken on behalf of the

16 Plaintiffs at 1770 Promontory Circle, Greeley,

Colorado 80634, on April 9, 2008, at 8:50 a.m.,

17 before Sharon L. Szotak, Registered Professional

Reporter, Certified Realtime Reporter, and Notary

18 Public within Colorado.

1 any knowledge of the Image Program that was being  
2 introduced. So it's related to the timing of knowledge  
3 about the Image Program and our working with Border  
4 Management Strategies to develop our own policies and  
5 procedures. It's a nuance difference.

6 Q. And to this day, Swift has not joined the  
7 Image Program, correct?

8 A. That's correct.

9 Q. Why was Border Management Strategies  
10 hired?

11 A. Ongoing efforts to make sure that we're  
12 fully compliant with employment eligibility and  
13 identity verification procedures.

14 Q. Going back for a minute -- we're not going  
15 to talk about those just right now.

16 Going back for a minute to the hiring  
17 practices of Swift, what, if anything, has Swift  
18 historically done to assist potential job applicants  
19 with transportation issues?

20 A. After the raids, we began busing people  
21 from Amarillo to the Cactus facility.

22 Q. Had that ever happened prior to the raids?

23 A. Not to my knowledge.

24 Q. Were there other transportation  
25 initiatives undertaken by Swift other than with respect